

RAAB, STURM & GANCHROW, LLP

COUNSELORS AT LAW

2125 CENTER AVENUE, SUITE 100
FORT LEE, NEW JERSEY 07024

Tel: (201)292-0150
FAX: (201)292-0152

RONALD RAAB*
IRA A. STURM****
ARI D. GANCHROW**

MAURA E. BREEN***
SAMUEL R. BLOOM*****

* ADMITTED IN NY
** ADMITTED IN NY AND NJ
*** ADMITTED IN NY AND CT
**** ADMITTED IN NY AND FLA
***** ADMITTED IN NY, NJ AND MD

October 28, 2024

VIA ECF ELECTRONIC FILING

Hon. Ronnie Abrams, U.S.D.J.
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 1506
New York, New York 10007

**Re: Manny Pastreich, as Trustee, et al. v. CSI Corporation of DC
Civil Action No. 24-cv-6648**

Dear Judge Abrams:

Our firm is counsel for the respective Plaintiffs in this matter. Presently, an Initial Conference this matter has been scheduled for **November 1, 2024, at 3:00 pm**. The Plaintiffs ask that this Conference and all related deadlines be adjourned due to issues serving Defendant CSI Corporation of DC (“Defendant”). The Plaintiffs also ask that the deadline to serve Defendant be extended thirty (30) days.

The Plaintiffs commenced this action on September 3, 2024. See ECF Document 1. The matter seeks unpaid contributions and reports owed due to Defendant self-reporting to the Funds. Through the following weeks, the Plaintiffs attempted to serve Defendant at its principal place of business in Washington, DC and the apparent residence of Defendant’s sole officer in Maryland. Both, to date, have proven unsuccessful. As per the process server, Defendant’s principal place of business on file with DC (and the Funds) is inaccurate, and there have been issues serving

Defendant's officer at her apparent residence. As a result, Plaintiffs are serving Defendant through the District of Columbia. Said papers were delivered to the DC Department of Licensing approximately three weeks ago. As per discussions with their staff, it is estimated the Plaintiffs will receive paperwork confirming service of the Summons and Complaint within three (3) weeks of now. Further, it should be noted that, while not accepting service, Defendant and the Plaintiffs are in communication by e-mail and telephone about the exact subject matter of this litigation

Upon receipt of the acknowledgment/affidavit of service from the necessary DC entity, the Plaintiffs will promptly move for Default Judgment twenty-one (21) days after service..

In light of Defendant's non-appearance and the present lack of documentation evidencing successful service on Defendant, and the representation made by the DC government, the Plaintiffs ask that the Conference be adjourned thirty (30) days.

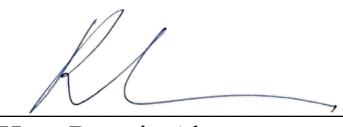
Respectfully submitted,

Samuel R. Bloom

cc: CSI Corporation of DC (via regular mail)

Application granted. The conference previously scheduled for November 1, 2024 at 3:00 p.m. is hereby adjourned to December 6, 2024 at 12:30 p.m. Additionally, the deadline to effect service on Defendant is hereby extended by thirty days to January 1, 2025. To the extent the parties seek to adjourn the conference until after service has been effected, they shall so notify the Court.

SO ORDERED.



Hon. Ronnie Abrams
October 29, 2024